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*Counsel for Defendant Pfizer Inc., Warner-Lambert Company,
Warner-Lambert Company, LLC, Pfizer Ireland Pharmaceuticals,
Warner-Lambert Export, Ltd.*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

RP HEALTHCARE, INC.; CHIMES
PHARMACY, INC.; JAMES CLAYWORTH,
R.Ph., an individual, d/b/a CLAYWORTH
PHARMACY; MARIN APOTHECARIES,
INC., d/b/a ROSS VALLEY PHARMACY;
GOLDEN GATE PHARMACY SERVICES,
INC., d/b/a GOLDEN GATE PHARMACY;
PEDIATRIC CARE PHARMACY, INC.;
MEYERS PHARMACY, INC.; TONY
MAVRANTONIS, R.Ph., an individual d/b/a
JACK'S DRUG; and TILLEY
APOTHECARIES, INC., d/b/a ZWEBER'S
APOTHECARY,

Plaintiffs,

v.

PFIZER, INC., PFIZER IRELAND
PHARMACEUTICALS, WARNER-LAMBERT
COMPANY, WARNER-LAMBERT
COMPANY, LLC, WARNER-LAMBERT
EXPORT, LTD., RANBAXY LABORATORIES
LIMITED, RANBAXY PHARMACEUTICALS,
INC., RANBAXY, INC., DAIICHI SANKYO,
LTD, DAIICHI SANKYO, INC., CVS
CAREMARK CORPORATION, HEALTH
NET, INC., and CALIFORNIA PHYSICIANS
SERVICE, INC. d/b/a Blue Shield of California,

Defendants.

Civil Action No.: 3:12-cv-01059 (JSW)

**STIPULATION TO EXTEND TIME
TO ANSWER AND
[PROPOSED ORDER]**

Hon. Jeffrey S. White

1 WHEREAS Plaintiffs filed an Action in the Superior Court of Sonoma County on January
 2 31, 2012, naming Pfizer, Inc., Pfizer Ireland Pharmaceuticals, Warner-Lambert Company,
 3 Warner-Lambert Company, LLC, and Warner-Lambert Export, Ltd (collectively, "Pfizer") as
 4 Defendants; and

5 WHEREAS, Plaintiffs served a copy of the Complaint on Defendants Pfizer Inc., Warner-
 6 Lambert Company, and Warner-Lambert Company, LLC on February 2, 2012; and

7 WHEREAS Plaintiffs' counsel and Pfizer's counsel have met and conferred on this issue
 8 in good faith and Pfizer's counsel agreed to voluntarily accept service for Pfizer Ireland
 9 Pharmaceuticals, Warner-Lambert Export, Ltd. to avoid the costs and expense related to foreign
 10 service; and

11
 12 WHEREAS the Notice of Removal of Action from State Court in the above-captioned
 13 action was filed on March 2, 2012; and

14 WHEREAS, Plaintiffs filed the Motion for Remand on March 15, 2012, which is set for
 15 hearing on April 27, 2012,

16 IT IS HEREBY STIPULATED AND AGREED, by Plaintiffs and Pfizer, through their
 17 respective counsel, that the deadline for Pfizer to answer or otherwise respond to Plaintiffs'
 18 Complaint shall be extended to thirty days following the Court's order on Plaintiffs' Motion for
 19 Remand, whether the case is remanded to State Court or remains in Federal Court.
 20

21
 22 Dated: March 23, 2012

Respectfully Submitted,

23 WHITE & CASE LLP

24
 25 /s/ Bijal V. Vakil

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*Counsel for Defendant Pfizer Inc., Warner-Lambert
Company, Warner-Lambert Company, LLC,
Pfizer Ireland Pharmaceuticals, Warner-Lambert
Export, Ltd.*

Dated: March 23, 2012

ALIOTO LAW FIRM

/s/ Jamie L. Miller

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Counsel for Plaintiffs

ATTESTATION CLAUSE

I, Bijal V. Vakil, hereby attest in accordance with General Order No. 45.X that each of the signatories above have provided their concurrence with the electronic filing of the foregoing document entitled STIPULATION TO EXTEND TIME TO ANSWER AND [PROPOSED] ORDER.

Dated: March 23, 2012

WHITE & CASE LLP

/s/ Bijal V. Vakil


BIJAL V. VAKIL

*Counsel for Defendant Pfizer Inc., Warner-Lambert
Company, Warner-Lambert Company, LLC,
Pfizer Ireland Pharmaceuticals, Warner-Lambert
Export, Ltd.*

ORDER

Pursuant to the above Stipulation filed in this action, it is hereby ORDERED that the time within which Defendants Pfizer Inc., Pfizer Ireland Pharmaceuticals, and Warner-Lambert Company LLC, Warner-Lambert Company and Warner-Lambert Export, Ltd may answer or otherwise respond to Plaintiffs' Complaint is hereby extended to thirty days following the Court's order on Plaintiffs' Motion for Remand.

Dated: March 26, 2012



THE HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE